

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

JUDGE ELLIS

MAGISTRATE JUDGE VALDEZ

UNITED STATES OF AMERICA

v.

IVAN PARKER

Case No. 18 CR 495

Violation: Title 18, United States
Code, Section 1951(a)

FILED

COUNT ONE

OCT 17 2018

The SPECIAL AUGUST 2017 GRAND JURY charges:

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

On or about July 27, 2018, at Chicago, in the Northern District of Illinois,
Eastern Division,

IVAN PARKER,

defendant herein, obstructed, delayed, and affected "commerce," as defined in Title 18, United States Code, Section 1951(b), and the movement of articles and commodities in commerce, by robbery, in that defendant unlawfully took and obtained United States currency from the person and in the presence of an employee of Loomis Armored U.S., against his will by means of actual and threatened force, and fear of injury to that employee;

In violation of Title 18, United States Code, Section 1951(a).

FORFEITURE ALLEGATION

The SPECIAL AUGUST 2017 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Section 1951(a), as set forth in this Indictment, defendant shall forfeit to the United States of America any property which constitutes and is derived from proceeds traceable to the offense, as provided in Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

2. The property to be forfeited includes, but is not limited to:

a) A personal money judgement in the amount equal to the outstanding proceeds derived from the offense in violation of Title 18, United States Code, Section 1951(a), estimated to be approximately \$55,000; and

b) The following specific property:

- i. approximately \$24,780 seized by law enforcement on September 14, 2018, from 419 North Broadway, Apartment B, Joliet, Illinois;
- ii. approximately \$7,010 seized by law enforcement on August 10, 2018, from 4244 West Cermak, Chicago, Illinois;
- iii. a white 2013 Buick Sedan, VIN 1G4PS5SK5D4126093;
- iv. pair of stud earrings;
- v. silver-colored earrings;
- vi. gold-colored earrings;
- vii. gold-colored necklace;
- viii. Samsung television;
- ix. PlayStation with two controllers;

- x. LG phone with pink cell phone case;
- xi. LG phone;
- xii. iPhone;
- xiii. Samsung phone;
- xiv. ZTE Model Z828 cell phone, serial number 3297648557AC;
- xv. LG cellular telephone, serial number 806CQYQ071650; and
- xvi. LG cellular telephone, serial number 511CQJZ1436156.

3. If any of the property described above, as a result of any act or omission by a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, as provided in Title 21, United States Code Section 853(p).

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY